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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
MOTION TO COMPEL DEPOSITIONS
OF DAVID BONDERMAN AND
ARIANNA HUFFINGTON**

Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal confidential information in portions of its Motion to Compel Depositions of David Bonderman and Arianna Huffington, and the exhibits thereto. Specifically, Waymo requests an order granting leave to file under seal confidential portions of the portions of the document as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Motion	Highlighted Portions	Defendants (blue highlighting)
Ex. 1 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 2 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 3 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 4 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 5 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 7 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 8 to Waymo’s Motion to Compel	Entire Document	Defendants
Ex. 9 to Waymo’s Motion to Compel	Highlighted Portions	Defendants (blue highlighting)

I. LEGAL STANDARD

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

II. UBER’S CONFIDENTIAL INFORMATION

Waymo seeks to seal the blue highlighted portions of its Motion, and the exhibits and highlighted portions of exhibits identified in the table above, because Defendants have designated the information confidential and/or highly confidential. Declaration of Felipe Corredor, ¶ 3. Waymo expects Defendants to file one or more declarations in accordance with the Local Rules. *Id.* ¶ 4.

III. CONCLUSION

In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above listed documents accompany this Administrative Motion. For the foregoing reasons, Waymo respectfully requests that the Court grant Waymo’s administrative motion to file under seal.

1 DATED: August 7, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

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3 By /s/ Charles Verhoeven

Charles Verhoeven

4 Attorneys for WAYMO LLC